



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OCT 15 2018

Mr. Daniel Liebowitz
Allnex USA Inc.
78 Rivergate Drive
Wilton, CT 06897

Re: PMNs P-18-0100 & P-18-0102

Dear Mr. Liebowitz:

This letter responds to the above-referenced Premanufacture Notices (PMN), received by the Environmental Protection Agency (EPA) on January 26, 2018. The PMNs described the chemical substances as:

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EPA has determined in accordance with TSCA section 5(a)(3)(C) that the PMN substances are not likely to present an unreasonable risk of injury to health or the environment under the intended and reasonably foreseen conditions of use. Attached to this letter is a summary of the basis of EPA's determination.

Under TSCA section 5(g), you may begin manufacture (which includes import) of these PMN substances immediately and do not need to wait for the 90-day review period to expire.

Please note that 40 CFR 720.102 requires you, within the first 30 days of commencement of manufacture (which includes import) of a PMN substance, to submit a Notice of Commencement (NOC) to EPA. If you wish the chemical identity to be listed on the Confidential Inventory, any prior claim of confidentiality must be reasserted and substantiated in accordance with 40 CFR 720.85(b) and 720.90(b).

Because you submitted your PMNs to EPA after the effective date of the electronic-PMN ("eTSCA/ePMN") final rule (75 FR 773), you must use the eTSCA/ePMN software to submit your NOC. After April 6, 2012, all submissions are required to be submitted electronically via the internet using the Central Data Exchange (CDX). Please see www.epa.gov/reviewing-new-chemicals-under-toxic-substances-control-act-tsca/how-submit-e-pmn for more information on the e-PMN software and directions on how to register and submit notices via CDX.

If the company has any questions or comments, please contact me at (202) 564-8469.

Sincerely,

Greg Schweer, Chief
New Chemicals Management Branch